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BROOKLYN OFFICE

July 25, 2006

BY HAND DELIVERY

The Honorable John Gleeson
United States District Judge
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Granted
So ordered
s/John Gleeson

USDJ

7-27-06

Re: U.S. v. Jonathan Einhorn, S1 05 Cr. 201 (JG)

Dear Judge Gleeson:

I write, as counsel to Jonathan Einhorn, to request a temporary modification of Mr. Einhorn's bail conditions.

Mr. Einhorn was released on bail in January 2004, after he self-surrendered, pursuant to a \$200,000 bond. (The bond was initially secured by a piece of property but, with the government's consent and the approval of the Court, the security was subsequently released.) Mr. Einhorn's bail conditions currently authorize him to travel within the continental United States. In addition, Mr. Einhorn surrendered his passport to Pretrial Services when he initially surrendered. For two-and-a-half years, Mr. Einhorn has scrupulously abided by all the conditions of his release. Mr. Einhorn's sentence, originally scheduled for June 10, 2005, has been adjourned a number of times at the government's request and is currently scheduled for October 27, 2006.

Mr. Einhorn requests permission to travel for five days to Israel so he can attend the *bris* of his brother's grandson. This is the first grandchild born to any of Mr. Einhorn's many brothers and sisters and thus is a very significant family event, which Mr. Einhorn very much wishes to attend. Mr. Einhorn would be traveling to Israel on Wednesday, July 26 and returning to the United States on Monday, July 31. While in Israel, Mr. Einhorn would be staying at his

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parents' home, which is located at Hakishon Street No. 32, Beit Shemesh, Israel (972-999-4881). Mr. Einhorn will return his passport to Pre-Trial Services on August 1, 2006, promptly upon his return.

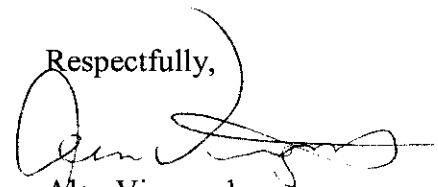
The Court should be aware that Mr. Einhorn has a two-and-a-half year-old son, Noham, for whom he has had primary childcare responsibilities virtually since Noham was born, and to whom he is extremely attached. In fact, Mr. Einhorn recently brought suit in Kings County Supreme Court to obtain a divorce from his wife and is actively seeking to obtain sole custody of his child. The custody hearing is scheduled for September 7, 2006. Given the long travel distance and short period of this trip, Mr. Einhorn will not be traveling to Israel with his son. We mention these facts only to make it clear to the Court not only that Mr. Einhorn will return to the United States but also that he has a strong personal incentive to do so.

I have contacted Assistant United States Attorney Richard Faughnan, Esq., who has informed me that the government has no objection to this request.

Accordingly, we respectfully request that this Court modify the conditions of Mr. Einhorn's release to permit Mr. Einhorn to travel to Israel during the period Wednesday, July 26, 2006 to Monday, July 31, 2006.

I thank Your Honor for your consideration of this request.

Respectfully,



Alan Vinegrad

cc: Richard Faughnan, Esq. (by facsimile)
Chief, Public Integrity Section
United States Attorney's Office

Mr. Robert Long (by facsimile)
U.S. Pretrial Services Officer